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June 25, 2020

VIA E-FILING

The Honorable Leonard P. Stark
U.S. District Court for the
District of Delaware
844 North King Street
Wilmington, DE 19801

Re: H. Lundbeck A/S v. Apotex Inc. et al., C.A. No. 18-088 (consolidated) (LPS)(JLH)

Dear Chief Judge Stark:

In light of the number of parties and experts involved in this case, and the ongoing restrictions on travel, Plaintiffs expect scheduling and logistical issues related to expert depositions and possibly trial. With respect to expert depositions, the parties currently have a total of 4 weeks in the schedule for depositions of 28 witnesses. With respect to trial logistics, many of the parties' fact and expert witnesses live abroad. Plaintiffs respectfully request that these matters be discussed during the hearing scheduled for tomorrow afternoon, if the Court's schedule permits.

Plaintiffs have corresponded with Defendants regarding their concerns with respect to expert discovery. Defendants yesterday responded with a request seeking multiple days of deposition time for many of Plaintiffs' experts. For example, Defendants requested a total of 64 hours of deposition with one of Plaintiffs' experts, 35 hours with another, and 21 hours with another. Thus, it seems clear that it would be beneficial to discuss these issues with Your Honor at the earliest opportunity.

Respectfully,

/s/ Megan E. Dellinger

Megan E. Dellinger (#5739)

MED/rs

cc: Clerk of the Court (via CM/ECF)
All Counsel of Record (via CM/ECF and e-mail)